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## COMMONWEALTH of VIRGINIA

### DEPARTMENT OF ENVIRONMENTAL QUALITY

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Code EV3, Bldg N-26, Room 3208  
Norfolk, VA 23511-3095

Re: **Draft Ecological Risk Assessment – Step 7; Upper Reaches of Bousch Creek, Camp Allen Landfill (Site 1);  
Naval Station Norfolk, Norfolk, VA**

Dear Ms. Johnson:

Thank you for the opportunity to comment on the *Draft Ecological Risk Assessment – Step 7; Upper Reaches of Bousch Creek, Camp Allen Landfill (Draft Step 7 ERA)* submitted September 16, 2005 by your consultant, Ms. Holly Rosnick with CH2M Hill, Inc. The Department of Environmental Quality's Office of Remediation Programs (the Department) has completed its review of the *Draft Step 7 ERA* and comments are provided below.

Comments are referenced in accordance with the *Draft Step 7 ERA* by section, paragraph (counting from the beginning of the section), sentence (counting from the beginning of the paragraph), and page number.

1. 2.2.1.4, paragraph 2, last sentence, page 2-4 – The CAPs addressing contaminated groundwater in the LP area are mentioned here and elsewhere in the *Draft Step 7 ERA*. Please include the Site 20 AS/SVE systems that are also addressing contaminated groundwater in this area.
2. 5.4, paragraph 2, 1<sup>st</sup> bullet, 7<sup>th</sup> sentence, page 5-3 – Please revise this sentence to read "If no significant difference existed...."
3. Section 6, Initial Creek-Wide Evaluation – Initial comparisons were conducted for media, fish tissue, and food web exposures on a creek-wide basis. The Department is concerned that such

creek-wide comparisons have the effect of “diluting” maximum detects and means and could, therefore, change the list of constituents that would carry through if only area-specific evaluations were conducted. Please provide detailed discussions in Sections 7 and 8 on the use of the creek-wide comparison and its possible effects on the results.

4. 6.1.2.2, paragraph 1, last sentence, page 6-2 – This states that, based upon the frequencies of detection and/or the magnitudes of the maximum HQs, certain constituents were identified as COPCs even though their mean HQs did not exceed one. Please specify the criteria for the frequency of detection and/or the magnitude of the maximum HQ of such constituents.
5. 6.1.2.4, paragraph 1, last sentence, page 6-3 – See comment 4 above.
6. 6.2.2, pages 6-3 through 6-4 – The mean concentrations did not exceed but approached NOEC-based screening values. Therefore, based upon the frequencies of detection and maximum concentrations, it seems that copper should have been selected as a COPC in the area-specific evaluations. (Also see comment 4 above.)
7. Section 8 – Per section 1.1, the results of the Step 7 ERA should include the magnitude of the potential risk. Please provide this analysis.

If you have questions concerning any of the above, please contact me at (804) 698-4131 or you may e-mail me at [gweng@deq.virginia.gov](mailto:gweng@deq.virginia.gov).

Sincerely,



Garwin W. Eng  
Environmental Engineer Senior  
ORP, FFR

- c: Todd M. Richardson – EPA Region III (3HS11)  
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Naval Station Norfolk Correspondence File